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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,

Debtors.**

Chapter 11

Case No. 09-50026 (MG)

(Jointly Administered)

**JOINDER OF THE PARTICIPATING UNITHOLDERS IN
THE GUC TRUST'S OMNIBUS OBJECTION TO MOTIONS FILED BY CERTAIN
PRE-CLOSING ACCIDENT PLAINTIFFS FOR AUTHORITY TO FILE LATE
PROOFS OF CLAIM FOR PERSONAL INJURIES AND WRONGFUL DEATH¹**

Certain unaffiliated holders (the “Participating Unitholders”) of more than 68.5 percent of the beneficial units of the Motors Liquidation Company GUC Trust (the “GUC Trust”), by and through their undersigned counsel, hereby join in the *The GUC Trust’s Omnibus Objection to Motions Filed by Certain Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* (the “Omnibus Objection”) filed by the GUC Trust. In support of this joinder (the “Joinder”), the Participating Unitholders respectfully state as follows:

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the *The GUC Trust’s Omnibus Objection to Motions Filed by Certain Pre-Closing Accident Plaintiffs for Authority to File Late Proofs of Claim for Personal Injuries and Wrongful Deaths* filed on April 20, 2020.

JOINDER

1. The Participating Unitholders agree with the factual assertions and legal arguments set forth by the GUC Trust in the Omnibus Objection and, accordingly, file this Joinder thereto.

2. The Participating Unitholders expressly reserve the right to supplement, modify and amend this Joinder and/or raise additional arguments in support of the Omnibus Objection in writing or orally at the hearing on the PIWD Motions.

CONCLUSION

For the reasons set forth herein and in the GUC Trust's Omnibus Objection, the Participating Unitholders respectfully request that the Court deny the PIWD Motions.

Dated: April 20, 2020
New York, New York

Respectfully submitted,

AKIN GUMP STRAUSS HAUER & FELD LLP

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